

156 13719
IN THE COURT OF COMMON
PLEAS
OF
BALTIMORE CITY.

ALFRED HOLMES

VS.

MARTIN HORN

DECLARATION

Mr. Clerk:

Please file.

J. Stearns Davis

ATTORNEY FOR DEFENDANT

DAVIS & EVANS
ATTORNEYS AT LAW

FILED MAR 5 1929

ALFRED HOLMES

:

IN THE COURT OF COMMON PLEAS

VS.

:

OF

MARTIN HORN

:

BALTIMORE CITY.

Alfred Holmes, by his attorney, J. Steward Davis, sues
Martin Horn.

For that the defendant is the owner of an automobile truck operated in the City of Baltimore and elsewhere in the State of Maryland, and at the time of the commission of the wrongs and grievances hereinafter complained of, was such owner; and for that on or about the 13th day of November, 1928, whilst the plaintiff was in the act of carefully and prudently driving along Springdale Road, at or near the intersection of Edgewood Avenue, both public highways of the City of Baltimore, State of Maryland; the automobile of the defendant under the management and control of the servants and agents of the defendant and while being operated in a negligent, careless and reckless manner, ran into and violently struck the automobile operated by the plaintiff, thereby knocking and throwing him with great force from his position at the steering wheel of the automobile operated by the plaintiff, whereby the plaintiff was seriously and painfully injured in and about his head, body and limbs, his nervous system was seriously impaired and he was caused to suffer great physical pain and mental anguish, he has been forced to undergo medical attention for a long period of time; he has been hindered and prevented from attending to his accustomed work and duties for a long period of time, thereby losing the emoluments he would have otherwise received from his calling;

and he ~~was~~ otherwise injured and damaged.

And the said plaintiff says that the injuries to his person and body were directly caused by the negligence, recklessness and carelessness of the said defendant his servants or agents and without negligence or want of due care on the part of the said plaintiff directly thereunto contributing.

WHEREFORE this suit is brought and the plaintiff claims \$2,500 damages.

J. Stewart Davis

ATTORNEY FOR PLAINTIFF

ALFRED HOLMES

:

IN THE COURT OF COMMON PLEAS

VS.

:

OF

MARTIN HORN

:

BALTIMORE CITY.

The plaintiff elects to have this case tried before
a Jury and prays leave of Court to do so.

J. Stewart Davis

ATTORNEY FOR PLAINTIFF

TO THE DEFENDANT: TAKE NOTICE:

That on the day of your appearance to this action in
The Court of Common Pleas of Baltimore City, a rule will be
entered requiring you to plead to the above declaration within
thirty days thereafter.

J. Stewart Davis

ATTORNEY FOR PLAINTIFF

✓ 19-194 137/29

No. 156

To March R. D. 19 29

Alfred Holmes.

Dead

vs.

Martin Horn

2208 Hayford Rd

WRIT OF SUMMONS

Copy

Action, copy of Nar, and notice to plead to be served on Defendant.

J. Steward Davis
Attorney.

Filed..... day of..... 19.....

20

RECEIVED AT
THE SHERIFF'S OFFICE

MAR 5 1929 10 51

Martina Est.
Burkham
John O'Neil
Sheriff

[WRIT OF SUMMONS]

STATE OF MARYLAND

BALTIMORE CITY, *to wit:*

To the Sheriff of Baltimore City, Greeting:

You are hereby commanded to summon.....

Martin Horni
.....
.....

of Baltimore City, to appear before the Court of Common Pleas, to be held at the Court House in the same City, on the second Monday of *March* next, to answer an action at the suit of

Alfred Holmes
.....
.....

and have you then and there this writ:

WITNESS, *the* Honorable SAMUEL K. DENNIS, Chief Judge of the Supreme Bench of Baltimore City,

the *14th* day of *January* 19 *29*
ISSUED *5* day of *March* 19 *29*

James Y. Claypole Clerk.

Serve on
Martin Harn
2208 Hartford Road

EST:-

JAMES Y. CLAYPOOLE

Clerk

NOTICE TO THE PERSON SUMMONED:-

Personal attendance in court on the day named in the writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made to the above mentioned suit, a judgment by default may be entered against you.

RETURNED FOR THE SENDER

NOTICE TO THE PERSON SUMMONED:-

Personal attendance in court on the day named in the writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made to the above mentioned suit, a judgment by default may be entered against you.

RETURNED FOR THE SENDER

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ALFRED HOLMES

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VS.

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MARTIN HORN

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And the said plaintiff says that the injuries to his person and body were directly caused by the negligence, recklessness and carelessness of the said defendant his servants or agents and without negligence or want of due care on the part of the said plaintiff directly thereunto contributing.

WHEREFORE this suit is brought and the plaintiff claims \$2,500 damages.

ATTORNEY FOR PLAINTIFF

ALFRED HOLMES

:

IN THE COURT OF COMMON PLEAS

VS.

:

OF

MARTIN HORN

:

BALTIMORE CITY.

NOTICE TO THE PERSON SUMMONED:

Personal attendance is required in court on the day named and will be not required but unless within such time of days named in this summons, legal

The plaintiff elects to have this case tried before a Jury and prays leave of Court to do so.

ATTORNEY FOR PLAINTIFF

TO THE DEFENDANT: TAKE NOTICE:

That on the day of your appearance to this action in The Court of Common Pleas of Baltimore City, a rule will be entered requiring you to plead to the above declaration within thirty days thereafter.

ATTORNEY FOR PLAINTIFF

Clerk
TO
CLERK
of
the
Court
of
Baltimore
City
1911